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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ZIH Corp.,

Plaintiff,

v.

Paxar Corporation,

Defendant.

C.A. No.: _____

03 CV 12358 DPW

COMPLAINT

MAGISTRATE JUDGE Alexander

Plaintiff ZIH Corp. ("ZIH") files this Complaint for patent infringement against defendant Paxar Corporation. Because of such patent infringement, ZIH has been damaged and irrevocably harmed, and seeks injunctive relief, compensatory and multiple damages, attorneys' fees, and costs and expenses.

PARTIES

1. ZIH is a corporation organized and existing under the laws of the state of Delaware, and having a usual place of business in Hamilton, Bermuda.

2. On information and belief, Paxar Corporation ("Paxar") is a corporation organized and existing under the laws of the state of New York, and has a principal place of business in White Plains, New York.

JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, including 35 U.S.C. § 271. This Court has exclusive jurisdiction over the subject matter of this action under 28 U.S.C. § 1338(a).

4. Venue is proper in the United States District Court for the District of Massachusetts pursuant to 28 U.S.C. §§ 1391 and 1400(b).

COUNT I

INFRINGEMENT OF U.S. PATENT 5,813,343

5. ZIH re-alleges and adopts by reference the allegations set forth in paragraphs 1-4 above.

6. On September 29, 1998, the United States Patent and Trademark Office duly and legally issued to Douglas J. Harb United States Patent No. 5,813,343, entitled "Printing Media Roll Mounting and Positioning Mechanism" (the '343 patent), a true and correct copy of which is attached hereto as Exhibit A.

7. ZIH Corp. is the assignee and owner of the '343 patent.

8. On information and belief, Paxar has infringed and is infringing the '343 patent throughout the United States. On information and belief, Paxar's acts of infringement include making, using, importing, selling, offering to sell, inducing the use and sale of, and/or contributing to the use and sale of, printers that fall within the scope of one or more claims of the '343 patent, including the Sierra Sport 2 printer.

9. On information and belief, Paxar is advertising, offering for sale, and selling the infringing printers in this judicial district, both directly and through its New England Regional Sales office located in Foxboro, Massachusetts.

10. On information and belief, Paxar has notice of the '343 patent.

11. On information and belief, Paxar's infringement of the '343 patent is willful.

12. ZIH is without an adequate remedy at law because Paxar's infringement has irreparably harmed ZIH and will continue to do so unless Paxar is enjoined by the court from the actions complained of herein.

COUNT II

INFRINGEMENT OF U.S. PATENT 5,860,753

13. ZIH re-alleges and adopts by reference the allegations set forth in paragraphs 1-12 above.

14. On January 19, 1999, the United States Patent and Trademark Office duly and legally issued to David F. Beck et al. United States Patent No. 5,860,753, entitled "Mechanism For Centering Rolls Of Paper Stock Supplied For Printing" (the '753 patent), a true and correct copy of which is attached hereto as Exhibit B.

15. ZIH Corp. is the assignee and owner of the '753 patent.

16. On information and belief, Paxar has infringed and is infringing the '753 patent throughout the United States. On information and belief, Paxar's acts of infringement include making, using, importing, selling, offering to sell, inducing the use and sale of, and/or contributing to the use and sale of, printers that fall within the scope of one or more claims of the '753 patent, including the Sierra Sport 2 printer.

17. On information and belief, Paxar is making, using, advertising, offering for sale, and selling the infringing printers in this judicial district, both directly and through its New England Regional Sales office located in Foxboro, Massachusetts.

18. On information and belief, Paxar has notice of the '753 patent.

19. On information and belief, Paxar's infringement of the '753 patent is willful.

20. ZIH is without an adequate remedy at law because Paxar's infringement has irreparably harmed ZIH and will continue to do so unless Paxar is enjoined by the court from the actions complained of herein.

PRAYERS FOR RELIEF

WHEREFORE, ZIH prays for a judgment in its favor, including:

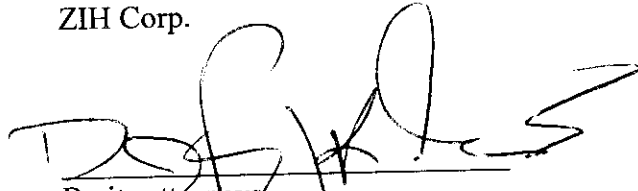
1. A finding that Paxar has infringed and continues to infringe the patents-in-suit;
2. A finding that Paxar's infringement of the patents-in-suit has been willful;
3. A preliminary and permanent injunction prohibiting Paxar, its officers, agents, servants, employees, attorneys, and all other persons in active concert or participation with Paxar, from further infringing the patents-in-suit throughout their remaining enforceable terms;
4. An award of ZIH's damages proximately caused by Paxar's unlawful acts;
5. An award of increased damages and punitive damages for the willful nature of Paxar's unlawful acts, said award to equal at least three times the amount of ZIH's actual damages;
6. An award of the costs and attorneys' fees ZIH has incurred in bringing and maintaining this action;
7. An award of pre-judgment and post-judgment interest; and
8. Such other and further relief as the Court deems proper.

Jury Trial Requested

ZIH requests a trial by jury on all issues so triable.

Dated: November 21, 2003

ZIH Corp.

A large, stylized handwritten signature in black ink, appearing to read 'Douglas J. Kline', is written over a horizontal line.

By its attorneys:

Douglas J. Kline, Esq.

BBO# 556680

Phone: (617) 248-7324 Fax: (617) 790-0157

Email: kline@tth.com

Christopher W. Stamos, Esq.

BBO# 633645

Phone: (617) 248-7026 Fax: (617) 790-0263

Email: stamos@tth.com

Brian M. Gaff, Esq.

BBO# 642297

Phone: (617) 310-8085 Fax: (617) 790-0332

Email: gaff@tth.com

William A. Meunier, Esq.

Phone: (617) 310-8313 Fax: (617) 790-0201

Email: meunier@tth.com

Testa, Hurwitz & Thibault, LLP

125 High Street

Boston, MA 02110-2704

Phone: (617) 248-7000

Fax: (617) 248-7100

www.tth.com

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